

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

MICHAEL WAUGH,
Plaintiff

v.

FLUOR CORPORATION AND
THE INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA,
Defendants.

§ REMOVED FROM
§ CAUSE NO. D-1-GN-15-002023
§ 200TH JUDICIAL DISTRICT
§ TRAVIS COUNTY, TEXAS
§
§ CIVIL ACTION NO. 1:15-cv-00559
§
§ JURY

EXHIBIT A TO NOTICE OF REMOVAL

- Certified Pleadings Asserting Causes of Action and Answers to Such Pleadings, All Executed Process in this Case, and All Orders Signed by the State Judge
- The Certified Docket Sheet from the 200th Judicial District Court in Travis County, Texas

TRAVIS COUNTY
District Clerk
DMS Case Document List

Cause Number: d-1-gn-15-002023

File Date	Category	Description	Additional Info
05/26/2015	PET-PL	ORIGINAL PETITION/APPLICATION	PLAINTIFF'S ORIGINAL PETITION
05/28/2015	SRVPROCESS	EXECUTED SERVICE	CITATION - INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA
05/28/2015	SRVPROCESS	EXECUTED SERVICE	CITATION - FLUOR CORPORATION
06/19/2015	ANS-RESP	ORIGINAL ANSWER	DEFENDANT FLUOR CORPORATIONS ORIGINAL ANSWER
06/19/2015	ANS-RESP	ORIGINAL ANSWER	DEFENDANT THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIAS ORIGINAL ANSWER

I, VELVA L. PRICE, District Clerk,
Travis County, Texas, do hereby certify that this is
a true and correct copy as same appears of
record in my office. Witness my hand and seal of
office on 6/23/2015

VELVA L. PRICE
DISTRICT CLERK
By Deputy:



5/26/2015 7:26:36 AM

Velva L. Price
District Clerk
Travis County
D-1-GN-15-002023

CAUSE NO. D-1-GN-15-002023

MICHAEL WAUGH,
Plaintiff,

V.

**FLUOR CORPORATION and
THE INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA,**
Defendants.

§ **IN THE DISTRICT COURT OF**
§
§
§ **TRAVIS COUNTY, TEXAS**
§
§
§ **200th JUDICIAL DISTRICT**

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, **MICHAEL WAUGH**, hereinafter called Plaintiff, complaining of and about **FLUOR CORPORATION and THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA**, hereinafter called Defendants, and for cause of action shows unto the Court the following:

DISCOVERY CONTROL PLAN LEVEL

1. Plaintiff intends that discovery be conducted under Discovery Level 3.

PARTIES AND SERVICE

2. Plaintiff, Michael Waugh, is an Individual whose address is 3201 Century Park Blvd. #526, Austin, Texas 78727.
3. The last three numbers of Michael Waugh's social security number are 517.
4. Defendant **FLUOR CORPORATION**, a Delaware for-profit corporation doing business in the State of Texas, may be served with process by serving its registered agent for service of process, Corporation Service Company d/b/a Lawyers Incorporating Service Company, 211 East 7th Street, Suite 620, Austin, Texas 78701-3218. *Service of this*



Defendant is hereby requested at this time.

5. Defendant THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA, an insurance company organized under the State of Pennsylvania and doing business in Texas, may be served with process by serving its attorney for service, Corporation Service Company, 211 East 7th Street, Suite 620, Austin, Texas 78701-3218.

Service of this Defendant is hereby requested at this time.

JURISDICTION AND VENUE

6. The subject matter in controversy is within the jurisdictional limits of this court.

7. Plaintiff seeks:

a. monetary relief over \$200,000 but not more than \$1,000,000.

8. This court has personal jurisdiction herein because Defendant is a Texas resident.

9. Venue in Travis County is proper in this cause pursuant to Section 17.56 of the Texas Business and Commerce Code.

FACTS

10. Michael Waugh was seriously injured in the course and scope of his employment in Venezuela on April 3, 2003. He was employed by Fluor Corporation and insured through The Insurance Company of the State of Pennsylvania, under a policy that provides worker's compensation coverage offering identical benefits as would be available to Plaintiff had he been injured in the course and scope of his employment while in the employ of a Texas employer subscribing to the Texas statutory worker's compensation in place in 2003.



11. Plaintiff has exhausted his indemnity benefits under the policy. However, he remains entitled to lifetime medical benefits, pursuant to the Texas statutory scheme in place in 2003. Plaintiff has presented claims for medical treatment under the policy. Defendant, rather than paying claims, has delayed payment in an effort to induce Plaintiff to settle his lifetime medical benefits in exchange for a lump sum payment approximately equivalent to the dollar amount of Plaintiff's present medical expense claim.

DECEPTIVE TRADE PRACTICES

12. Plaintiff would show that Defendant engaged in certain false, misleading and deceptive acts, practices and/or omissions actionable under the Texas Deceptive Trade Practices - Consumer Protection Act (Texas Business and Commerce Code, Chapter 17.41, et seq.), as shown by the conduct alleged above.

13. Unfair Claim Settlement Practices. Defendant engaged in unfair claim settlement practices prohibited by Section 541.060 of the Texas Insurance Code, to wit:

- (a) misrepresenting to a claimant a material fact or policy provision relating to coverage at issue;
- (b) failing to attempt in good faith to effectuate a prompt, fair, and equitable settlement of a claim with respect to which the insurer's liability has become reasonably clear;
- (c) failing to attempt in good faith to effectuate a prompt, fair, and equitable settlement of a claim under one portion of a policy with respect to which the insurer's liability has become reasonably clear to influence the claimant to settle another claim under another portion of the coverage unless payment under one portion of the



coverage constitutes evidence of liability under another portion;

(d) failing to promptly provide to a policyholder a reasonable explanation of the basis in the policy, in relation to the facts or applicable law, for the insurer's denial of a claim or offer of a compromise settlement of a claim; and

(e) failing within a reasonable time to:

- (1) affirm or deny coverage of a claim to a policyholder; or
- (2) submit a reservation of rights to a policyholder.

14. Late Payment of Claims. Failed to promptly pay an insurance claim in violation of Texas Insurance Code chapter 542, subchapter B, to wit:

- (a) failing to acknowledge, investigate or request information about the claim,
- (b) failing to accept, reject, or extend the deadline for deciding the claim, or
- (c) failing to pay the claim;

15. Misrepresentation of Insurance Policy. Defendant misrepresented an insurance policy as prohibited by Section 541.061 of the Texas Insurance Code, to wit:

- (a) making a material misstatement of law; and
- (b) failing to disclose a matter required by law to be disclosed, including failing to make a disclosure in accordance with another provision of the Texas Insurance Code.

16. Unfair and Deceptive Acts or Practices. Defendant also engaged in unfair and deceptive acts or practices prohibited by Subchapter B, Chapter 541, Texas Insurance Code.

17. Reliance. Plaintiff would further show the acts, practices and/or omissions complained of under Chapter 541 of the Texas Insurance Code were relied upon by Plaintiff to Plaintiff's detriment.



BREACH OF CONTRACT

18. Plaintiff would further show that the actions and/or omissions of Defendant described hereinabove constitute breach of contract, which proximately caused direct and consequential damages of Plaintiff w, and for which Plaintiff hereby sues.

ECONOMIC AND ACTUAL DAMAGES

19. Plaintiff sustained the following economic and actual damages as a result of the actions and/or omissions of Defendant described hereinabove:

- (a) Reasonable medical care and expenses in the past.
- (b) Reasonable and necessary medical care and expenses which will in all reasonable probability be incurred in the future.

DAMAGES FOR MENTAL ANGUISH

20. Plaintiff would further show that the false, misleading and deceptive acts, practices and/or omissions described hereinabove were committed "knowingly," as provided by Section 17.45(9) of the Texas Business and Commerce Code, in that Defendant had actual awareness of the falsity, deception, or unfairness of such acts, practices, and/or omissions.

21. As a result of such acts, practices and/or omissions, Plaintiff sustained a high degree of mental pain and distress of such nature, duration and severity that would permit the recovery of damages for mental anguish pursuant to Section 17.50(b) of the Texas Business and Commerce Code, and for which Plaintiff hereby sues in an amount in excess of the minimum jurisdictional limits of this Court.

MULTIPLE DAMAGES

22. As alleged hereinabove, Plaintiff would show that the false, misleading and deceptive acts, practices and/or omissions complained of herein were committed "knowingly"



in that Defendant had actual awareness of the falsity, deception, or unfairness of such acts, practices, and/or omissions.

23. Plaintiff further avers that such acts, practices, and/or omissions were committed "intentionally" in that Defendant specifically intended that Plaintiff act in detrimental reliance on the falsity or deception or in detrimental ignorance of the unfairness.

24. Therefore, Plaintiff is entitled to recover multiple damages as provided by 17.50(b)(1) of the Texas Business and Commerce Code.

EXEMPLARY DAMAGES

25. Plaintiff would further show that the acts and omissions of Defendant complained of herein were committed knowingly, willfully, intentionally, with actual awareness, and with the specific and predetermined intention of enriching said Defendant at the expense of Plaintiff. In order to punish said Defendant for such unconscionable overreaching and to deter such actions and/or omissions in the future, Plaintiff also seeks recovery from Defendant for exemplary damages as provided by Section 41.003(a)(1) of the Texas Civil Practice and Remedies Code.

ATTORNEY'S FEES

26. Request is made for all costs and reasonable and necessary attorney's fees incurred by or on behalf of Plaintiff herein, including all fees necessary in the event of an appeal of this cause to the Court of Appeals and the Supreme Court of Texas, as the Court deems equitable and just, as provided by: (a) Section 541.152(a)(1) of the Texas Insurance Code; (b) Chapter 38 of the Texas Civil Practice and Remedies Code; and, (c) common law.



PRAYER

WHEREFORE, PREMISES CONSIDERED, Plaintiff, Michael Waugh, respectfully prays that the Defendants be cited to appear and answer herein, and that upon a final hearing of the cause, judgment be entered for the Plaintiff against Defendants for the economic and actual damages requested hereinabove in an amount in excess of the minimum jurisdictional limits of the Court, together with prejudgment and postjudgment interest at the maximum rate allowed by law, attorney's fees, costs of court, and such other and further relief to which the Plaintiff may be entitled at law or in equity, whether pled or unpled.

PLAINTIFF HEREBY DEMANDS TRIAL BY JURY

Respectfully submitted,

CRAMPTON LAW OFFICE
3355 Bee Caves Road, Suite 301-B
West Lake Hills, Texas 78746
(512) 892-9300 Telephone
(512) 891-0262 Facsimile



By: _____

MARK CRAMPTON
MARK@CLOATX.COM
STATE BAR NO. 00789786

ATTORNEY FOR PLAINTIFF
MICHAEL WAUGH

I, VELVA L. PRICE, District Clerk,
Travis County, Texas, do hereby certify that this is
a true and correct copy as same appears of
record in my office. Witness my hand and seal of
office on 6/23/2015

VELVA L. PRICE
DISTRICT CLERK
By Deputy:



C I T A T I O N
T H E S T A T E O F T E X A S
C A U S E N O . D - 1 - G N - 1 5 - 0 0 2 0 2 3

MICHAEL WAUGH

, Plaintiff

vs.

FLUOR CORPORATION AND THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA

, Defendant

TO: FLUOR CORPORATION
BY SERVING THROUGH ITS REGISTERED AGENT
CORPORATION SERVICE COMPANY D/B/A LAYWERS INCORPORATING
SERVICE COMPANY 211 EAST 7TH STREET SUITE 620
AUSTIN, TEXAS 78701-3218

Filed in The District Court
of Travis County, Texas

MAY 28 2015

At 3:28 M.
Velva L. Price, District Clerk

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

Attached is a copy of the ORIGINAL PETITION of the PLAINTIFF in the above styled and numbered cause, which was filed on MAY 26, 2015 in the 200TH JUDICIAL DISTRICT COURT of Travis County, Austin, Texas.

ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, May 26, 2015.

REQUESTED BY:
MARK WESLEY CRAMPTON
CRAMPTON LAW OFFICE
3355 BEE CAVE ROAD, STE 301-B
WEST LAKE HILLS, TX 78746
BUSINESS PHONE: (512) 892-9300 FAX: (512) 891-0262



004048391



Velva L. Price
Velva L. Price
Travis County District Clerk
Travis County Courthouse
1000 Guadalupe, P.O. Box 679003 (78767)
Austin, TX 78701

PREPARED BY: WINKLER PATRICIA

----- R E T U R N -----
Came to hand on the 26 day of May, 2015 at 11:35 o'clock A M., and
executed at _____ within the County of _____
on the _____ day of _____, _____, at _____ o'clock _____ M.,
by delivering to the within named _____, each
in person, a true copy of this citation together with the PLAINTIFF'S ORIGINAL PETITION
accompanying pleading, having first attached such copy of such citation to such copy of pleading
and endorsed on such copy of citation the date of delivery.

Service Fee: \$ 67.00

Sheriff / Constable / Authorized Person

Sworn to and subscribed before me this the

By: _____

RETURN ATTACHED
Printed Name of Server

Notary Public, THE STATE OF TEXAS

County, Texas

D-1-GN-15-002023

SERVICE FEE NOT PAID

 Original Service Copy**DRLS**

516 West Annie St.
Austin, Texas 78704
9500-1



ORIGINAL

RETURN

Cause No. D-1-GN-15-002023

Came to hand on the 26th day of May, 2015, at 11:35 o'clock a.m.

X Citation
X Plaintiff's Original Petition
X Lawyer Referral Info. Sheet

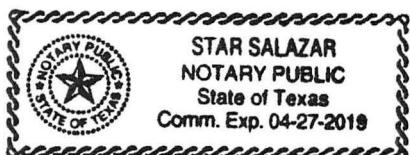
Executed at 211 E. 7th Street, Ste. 620, Austin, Texas 78701, within the County of Travis, on the 27th day of May, 2015, at 3:12 o'clock p. m., by delivering to the within named, FLOUR CORPORATION, by delivering to its Registered Agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, by delivering in person to Sue Vertrees, employee designated to receive process for the registered agent, a true and correct copy of the above specified civil process. I am over eighteen (18) years of age and not a party to or interested in the outcome of the above numbered cause. I am authorized to serve citations and other notices in this cause by Texas Supreme Court Order #SCH1660, exp. 11/30/2017. The statements/facts herein contained are within my personal knowledge. This return is attached to original process or a true copy thereof. I declare under penalty of perjury that the foregoing is true and correct.

Tod E. Pendergrass
 Printed Name of Process Server


 Signature of Authorized Process Server
 DRLS, 516 W. Annie, Austin, Tx. 78704
 Re: Crampton/9500-1

VERIFICATION
 STATE OF TEXAS, COUNTY OF TRAVIS

Before me, a notary public, on this day personally appeared the above named person, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements/facts therein contained are within his/her personal knowledge to be true and correct. Given under my hand and seal of office on the 28th day of May, 2015.



Star Salazar
 NOTARY PUBLIC in and for the State of TEXAS

I, VELVA L. PRICE, District Clerk, Travis County, Texas, do hereby certify that this is a true and correct copy as same appears of record in my office. Witness my hand and seal of office on 6/23/2015



VELVA L. PRICE
 DISTRICT CLERK
 By Deputy:

Adrienne J. Cato



C I T A T I O N
T H E S T A T E O F T E X A S
C A U S E N O. D-1-GN-15-002023

MICHAEL WAUGH

, Plaintiff

vs.

FLUOR CORPORATION AND THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA

, Defendant

TO: INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA
BY SERVING THROUGH ITS REGISTERED AGENT
CORPORATION SERVICE COMPANY
211 EAST 7TH STREET SUITE 620
AUSTIN, TEXAS 78701-3218

Filed in The District Court
of Travis County, Texas

MAY 28 2015

3:28

At M.
Velva L. Price, District Clerk

Defendant, in the above styled and numbered cause:

YOU HAVE BEEN SUED. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 A.M. on the Monday next following the expiration of twenty days after you were served this citation and petition, a default judgment may be taken against you.

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ISSUED AND GIVEN UNDER MY HAND AND SEAL of said Court at office, May 26, 2015.

REQUESTED BY:

MARK WESLEY CRAMPTON
CRAMPTON LAW OFFICE
3355 BEE CAVE ROAD, STE 301-B
WEST LAKE HILLS, TX 78746
BUSINESS PHONE: (512) 892-9300 FAX: (512) 891-0262



004048397



Velva L. Price
Travis County District Clerk
Travis County Courthouse
1000 Guadalupe, P.O. Box 679003 (78767)
Austin, TX 78701

PREPARED BY: WINKLER PATRICIA

--- R E T U R N ---
Came to hand on the 26 day of May, 2015 at 11:35 o'clock A M., and
executed at _____ within the County of _____
on the _____ day of _____, _____, at _____ o'clock _____ M.,
by delivering to the within named _____, each
in person, a true copy of this citation together with the PLAINTIFF'S ORIGINAL PETITION
accompanying pleading, having first attached such copy of such citation to such copy of pleading
and endorsed on such copy of citation the date of delivery.

Service Fee: \$ 66.00

Sheriff / Constable / Authorized Person

Sworn to and subscribed before me this the

By: _____

RETURN ATTACHED

Printed Name of Server _____

Notary Public, THE STATE OF TEXAS

D-1-GN-15-002023

Original

Service Copy

SERVICE FEE NOT PAID

DRLS

516 West Annie St.

Austin, Texas 78704
9500-2

County, Texas

P01 000030195



ORIGINAL

RETURN

Cause No. D-1-GN-15-002023

Came to hand on the 26th day of May, 2015, at 11:35 o'clock a.m.

Citation
 Plaintiff's Original Petition
 Lawyer Referral Info. Sheet

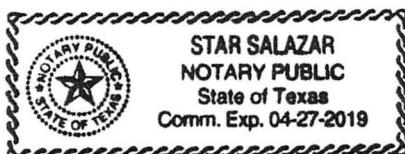
Executed at 211 E. 7th Street, Ste. 620, Austin, Texas 78701, within the County of Travis, on the 27th day of May, 2015, at 3:12 o'clock p. m., by delivering to the within named, INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA, by delivering to its Registered Agent, Corporation Service Company d/b/a CSC-Lawyers Incorporating Service Company, by delivering in person to Sue Vertrees, employee designated to receive process for the registered agent, a true and correct copy of the above specified civil process. I am over eighteen (18) years of age and not a party to or interested in the outcome of the above numbered cause. I am authorized to serve citations and other notices in this cause by Texas Supreme Court Order #SCH1660, exp. 11/30/2017. The statements/facts herein contained are within my personal knowledge. This return is attached to original process or a true copy thereof. I declare under penalty of perjury that the foregoing is true and correct.

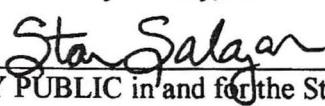
Tod E. Pendergrass
 Printed Name of Process Server


 Signature of Authorized Process Server
 DRLS, 516 W. Annie, Austin, Tx. 78704
 Re: Crampton/9500-2

VERIFICATION
 STATE OF TEXAS, COUNTY OF TRAVIS

Before me, a notary public, on this day personally appeared the above named person, known to me to be the person whose name is subscribed to the foregoing document and, being by me first duly sworn, declared that the statements/facts therein contained are within his/her personal knowledge to be true and correct. Given under my hand and seal of office on the 28th day of May, 2015.




 NOTARY PUBLIC in and for the State of TEXAS

I, VELVA L. PRICE, District Clerk,
 Travis County, Texas, do hereby certify that this is
 a true and correct copy as same appears of
 record in my office. Witness my hand and seal of
 office on 1/23/2015



VELVA L. PRICE
 DISTRICT CLERK
 By Deputy:





6/19/2015 2:31:44 PM

Velva L. Price
District Clerk
Travis County
D-1-GN-15-002023

CAUSE NO. D-1-GN-15-002023

MICHAEL WAUGH,
Plaintiff,

V.

FLUOR CORPORATION and
THE INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA
Defendants.

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

200TH JUDICIAL DISTRICT

DEFENDANT FLUOR CORPORATION'S ORIGINAL ANSWER

NOW COMES DEFENDANT Fluor Corporation ("Fluor") in the above-styled litigation, and files this Original Answer to Plaintiff's Petition. In support thereof, Fluor will show the Court as follows:

I.
GENERAL DENIAL

Defendant Fluor generally denies every allegation in Plaintiffs' Original Petition, and in any amended or supplemental petitions which may be filed by Plaintiff after this date, and respectfully requests that Plaintiff be required to prove his allegations against Defendant Fluor by a preponderance of the evidence.

II.
PRAYER

WHEREFORE, Fluor respectfully requests that:

1. Plaintiff takes nothing by his suit, and Fluor recovers attorneys' fees and costs of court;
2. On final hearing of Plaintiff's claims, the claims against Fluor be dismissed with prejudice; and



3. Fluor recovers all costs, together with such other relief, both general and special, to which it may be justly entitled.

Respectfully submitted,

**SCHOUEST, BAMDAS, SOSHEA & BENMAIER,
PLLC**

/s/ M. Lane Lowrey

M. Lane Lowrey
Texas Bar No. 24013065
llowrey@sbsblaw.com
1001 McKinney Street, Suite 300
Houston, Texas 77002
Telephone: (713) 588-0446
Facsimile: (713) 297-1654

**ATTORNEYS FOR DEFENDANT
FLUOR CORPORATION**



CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of June, 2015, a true and correct copy of the above and foregoing was forwarded to all counsel of record via certified mail, return receipt requested, hand-delivery or facsimile and addressed as follows:

Via Facsimile: 512.891.0262

Mark Crampton
Crampton Law Office
3355 Bee Cave Road, Suite 301-B
West Lake Hills, Texas 78746
Counsel for Plaintiff

/s/M. Lane Lowrey

M. Lane Lowrey

I, VELVA L. PRICE, District Clerk,
Travis County, Texas, do hereby certify that this is
a true and correct copy as same appears of
record in my office. Witness my hand and seal of
office on 6/23/2015



VELVA L. PRICE
DISTRICT CLERK
By Deputy:

A handwritten signature in blue ink that appears to read "Velva L. Price".

Fluor Corporation's Original Answer



6/19/2015 3:31:48 PM

Velva L. Price
District Clerk
Travis County
D-1-GN-15-002023

CAUSE NO. D-1-GN-15-002023

MICHAEL WAUGH,
Plaintiff

v.

FLUOR CORPORATION AND
THE INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA,
Defendants

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

200TH JUDICIAL DISTRICT COURT

**DEFENDANT THE INSURANCE COMPANY OF
THE STATE OF PENNSYLVANIA'S ORIGINAL ANSWER**

Defendant The Insurance Company of the State of Pennsylvania ("ICSOP") files this Original Answer to the Original Petition filed by Plaintiff Michael Waugh.

GENERAL DENIAL

ICSOP pleads a general denial as permitted by Rule 92 of the Texas Rules of Civil Procedure and demands strict proof as required by law.

PRAYER

Defendant The Insurance Company of the State of Pennsylvania, asks this Court to dismiss this suit or render judgment that Plaintiff takes nothing. ICSOP also asks this Court to assess all costs and fees against Plaintiff. Lastly, ICSOP asks this Court to grant it all other relief, at law or at equity, to which it may show itself to be justly entitled.



Respectfully submitted,

/s/ Thomas C. Wright

Thomas C. Wright

State Bar No. 22059400

Henry S. Platts, Jr.

State Bar No. 00784770

Natasha N. Taylor

State Bar No. 24071117

WRIGHT & CLOSE, LLP

One Riverway, Suite 2200

Houston, Texas 77056

Telephone: (713) 572-4321

Facsimile: (713) 572-4320

wright@wrightclose.com

platts@wrightclose.com

taylor@wrightclose.com

**ATTORNEYS FOR DEFENDANT
THE INSURANCE COMPANY OF THE
STATE OF PENNSYLVANIA**



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document was served on all counsel of record in this case, identified below, on June 19, 2015, electronically through the electronic filing manager in compliance with the Texas Rules of Civil Procedure:

Mark Crampton
Crampton Law Office
3355 Bee Caves Road, Suite 301-B
West Lake Hills, Texas 78746
mark@cloatx.com

/s/ Natasha N. Taylor
Natasha N. Taylor

I, VELVA L. PRICE, District Clerk,
Travis County, Texas, do hereby certify that this is
a true and correct copy as same appears of
record in my office. Witness my hand and seal of
office on 6/23/2015



VELVA L. PRICE
DISTRICT CLERK
By Deputy:

